

## REMARKS/ARGUMENTS

Claims 1-27 are pending in the application. Claims 1-2, 6-11, 15-20, and 24-27 have been amended. Reconsideration is respectfully requested. Applicant submits that the pending claims 1-27 are patentable over the art of record and allowance is respectfully requested of claims 1-27.

Applicants would like to thank the Examiner for reviewing and initialing references submitted in Information Disclosure Statements. In an Information Disclosure Statement received by the USPTO on April 12 2004 two references were not initialed. The references are: 1) Lu, Z, "Scalable Distributed Architectures for Information Retrieval," dated 1999; and 2) Tomasic, et al., "Incremental Updates of Inverted Lists for Text Document Retrieval", dated 1994. Applicants respectfully request that the Examiner review and initial these references.

Claims 1-27 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants respectfully traverse, but, to expedite prosecution, Applicants have amended the claims.

Claims 1, 10, and 19 are rejected as the terms "information" and "context information are vague. Applicants have amended "information" to "relevance score" (e.g., Specification, page 8, paragraph 29).

Claims 2, 11, and 20 are rejected as the term "proximity class" is vague. Applicants have amended the claims to describe that proximity class information specifies how close a source document is to the target document (e.g., Specification, page 6, paragraph 21).

Claims 6, 15, and 24 are rejected as "a weighted sum of occurrences" is not defined and understood. Applicants' have amended the claims to describe that a weight of each individual occurrence of the anchor text is determined by a proximity class of an anchor and a weight associated with that proximity class (e.g., Specification, page 7, paragraph 26).

Claims 10-18 are rejected as not constructing a computer system and using the term "logic". Applicants have amended claim 10 to clarify that the computer system comprises

hardware logic that processes anchor text as claimed (e.g., paragraph 35 on pages 9-10 of the Specification).

Claims 19-27 are rejected as “an article of manufacture” as the operations claimed do not define the invention of an article of manufacture. Applicants have amended claim 19 to further clarify the term “article of manufacture” as comprising one of hardware logic and a computer readable medium including a program for processing anchor text in documents, wherein the hardware logic or program causes operations to be performed (e.g., paragraph 35 on pages 9-10 of the Specification). Applicants respectfully submit that such an article of manufacture processes anchor text as claimed.

Claims 1-27 are rejected under 35 U.S.C. 102(b) as being anticipated by Li (U.S. Patent No. 5,920,859). Applicants respectfully traverse.

Anticipation requires that the identical invention must be shown in a single reference in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Applicants respectfully submit that the Li patent does not show the identical invention claimed by Applicants.

Claims 1, 10, and 19 describe forming a set of anchors that point to a target document and grouping together anchors with same anchor text (e.g., Specification, page 7, paragraph 26). Also, claims 1, 10, and 19 describe computing a relevance score for each group and generating context information for the target document based on the computed relevance score, wherein a title is composed from text of a group with a highest relevance score and a summary of the target document is composed from anchor texts of a number of groups with highest relevance scores (e.g., Specification, page 8, paragraphs 29-30).

The Li patent describes calculating a relevance score for each document by finding a dot product of each document link vector with the query vector (Col. 9, lines 16-20). The relevance scores are used to sort documents so that documents having higher relevance rankings are listed above those with lower rankings (Col. 9, lines 59-61).

The Li patent does not, for example, describe computing a relevance score for each group and generating context information for the target document based on the computed relevance score, wherein a title is composed from text of a group with a highest relevance score and a

summary of the target document is composed from anchor texts of a number of groups with highest relevance scores.

Therefore, claims 1, 10, and 19 are not anticipated by the Li patent.

Dependent claims 2-9, 11-18, and 20-27 incorporate the language of independent claims 1, 10, and 19 and add additional novel elements. Therefore, dependent claims 2-9, 11-18, and 20-27 are not anticipated by the Li patent for at least the same reasons as were discussed with respect to claims 1, 10, and 19.

Claims 1-7, 9-15, 17-25, and 27 are rejected under 35 U.S.C. 102(e) as being anticipated by Kim et al. (US 2002/0169770). Applicants respectfully traverse.

Anticipation requires that the identical invention must be shown in a single reference in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Applicants respectfully submit that the Kim patent application does not show the identical invention claimed by Applicants.

Claims 1, 10, and 19 describe forming a set of anchors that point to a target document and grouping together anchors with same anchor text (e.g., Specification, page 7, paragraph 26). Also, claims 1, 10, and 19 describe computing a relevance score for each group and generating context information for the target document based on the computed relevance score, wherein a title is composed from text of a group with a highest relevance score and a summary of the target document is composed from anchor texts of a number of groups with highest relevance scores (e.g., Specification, page 8, paragraphs 29-30).

The Kim patent application describes that the advantage of attaching anchor text to the character strings of the documents is that the anchor text can be used to define the category properties (page 6, paragraph 74).

The Kim patent application does not, for example, describe computing a relevance score for each group and generating context information for the target document based on the computed relevance score, wherein a title is composed from text of a group with a highest relevance score and a summary of the target document is composed from anchor texts of a number of groups with highest relevance scores.

Therefore, claims 1, 10, and 19 are not anticipated by the Kim patent.

Dependent claims 2-7, 10-15, 17-18, 20-25, and 27 incorporate the language of independent claims 1, 10, and 19 and add additional novel elements. Therefore, dependent claims 2-7, 10-15, 17-18, 20-25, and 27 are not anticipated by the Kim patent application for at least the same reasons as were discussed with respect to claims 1, 10, and 19.

#### Conclusion

For all the above reasons, Applicant submits that the pending claims 1-27 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460.

The attorney of record invites the Examiner to contact her at (310) 553-7973 if the Examiner believes such contact would advance the prosecution of the case.

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